

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION**

JOHN SHERWOOD, individually, and as
surviving spouse of STEPHANIE
SHERWOOD, and as guardian and natural
parent of BRET SHERWOOD and
REBECCA SHERWOOD, minors,

Plaintiff,

vs.

MICHELIN NORTH AMERICA, INC.,
MICHELIN NORTH AMERICA
(CANADA), INC., MICHELIN
AMERICAS RESEARCH AND
DEVELOPMENT CORPORATION, and
FORD MOTOR COMPANY,

Defendants.

CIVIL ACTION FILE

NO. 7:06-CV-00093-HL

STIPULATED ADDENDUM TO CONSENT CONFIDENTIALITY ORDER

For the reason that the Consent Confidentiality Order does not expressly identify to whom Protected Documents produced by Ford which are marked "Non-Sharing", "Subject to Non-Sharing Protective Order" or similar designation as "Non-Sharing" may be provided by receiving parties, an Addendum to the Consent Confidentiality Order is necessary and is hereby stipulated to by Michelin North America, Inc. ("MNA"), Michelin North America (Canada), Inc.

("MNACI") and Michelin Americas Research and Development Corporation ("MARC") (collectively the "Michelin Defendants"), Ford Motor Company ("Ford"), and Plaintiffs, which relates solely to Protected Documents produced or to be produced by Ford marked "Non-Sharing", "Subject to Non-Sharing Protective Order" or similar designation as "Non-Sharing".

IT IS HEREBY ORDERED THAT:

1. Section III Paragraph 2 of the Consent Confidentiality Order shall be modified to include the following provision, numbered Paragraph 2 (h), which shall be read as immediately following Paragraph 2 (g) and shall only apply to Confidential Material produced by Ford marked "Non-Sharing", "Subject to Non-Sharing Protective Order" or similar designation as "Non-Sharing":
 - 2 (h). Confidential Material marked "Non-Sharing", "Subject to Non-Sharing Protective Order" or similar designation as "Non-Sharing" to be produced by Ford, shall be disclosed only to "Qualified Persons." Qualified Persons are limited to:
 - a. Counsel of Record for the parties, and the parties;
 - b. Non-technical and clerical staff employed by Counsel of Record and involved in the preparation and trial of this action;
 - c. Experts and non-attorney consultants retained by the parties for the preparation or trial of this case, provided that no disclosure shall be made to any expert or consultant who is employed by a competitor of Ford; and
 - d. The Court, the Court's staff.
2. Section III Paragraph 3 of the Consent Confidentiality Order shall be modified to include reference to the newly added Section III

Paragraph 2(h) above, as well as 2(g), and shall read, in its entirety, as follows:

3. Plaintiffs' Counsel must make reasonable efforts to insure the individuals described in paragraphs 2(b)-(d) and (f)-(h) above are "Qualified Persons."

Prior to the disclosure of Confidential Material to any Qualified Person described in subparagraphs (b)-(d) and (f)-(h) of Paragraph 2 above, the Qualified Person shall sign a "Written Assurance" in the form of Exhibit "A" attached hereto. The Court, its authorized staff and the jury in this case are excluded from this provision. Counsel for Plaintiffs shall retain each such executed "Written Assurance" and shall keep a list identifying (a) all persons described in paragraphs 2 (b)-(d) and (f)-(h) above to whom Protected Documents have been disclosed, and (b) all Protected Documents disclosed to such persons. Each such executed Written Assurance and list shall be submitted to counsel for the Michelin Defendants and counsel for Ford at the termination of this litigation, and to counsel for the Michelin Defendants and/or Ford upon request as indicated below.

Any person receiving Confidential Material shall maintain the Confidential Material in a protected and secure manner and restrict access at all times to Qualified Persons only. As the Protected Documents may only be distributed to "Qualified Persons," Plaintiffs' Counsel, and all persons described in paragraph 2 above, may not post Confidential Material on any website or internet accessible document repository.

At the conclusion of the case, all recipients of Confidential Material, except material produced by Ford which is not marked "Subject to Non-Sharing Protective Order" or "Non-Sharing" by other similar language, shall return it to the Designated Attorney who provided it, who shall return it to the party which produced it, in accordance with this Order. All Qualified Persons in possession of Confidential Material, except material produced by Ford which is not marked "Subject to Non-Sharing Protective Order" or "Non-Sharing" by other similar language, shall also execute a "Closing Affidavit" in the form of Exhibit "B" attached hereto, as set forth in section IV of this Order. Recipients shall not be required to return to Ford Confidential

Material produced by Ford which is not marked "Subject to Non-Sharing Protective Order" or "Non-Sharing" by other similar language after the conclusion of this case and may retain the documents pursuant to the terms of this Order. The Court, its authorized staff and the jury in this case are excluded from this provision.

3. All other provisions of the Consent Confidentiality Order shall remain unaffected by this Addendum.

SO ORDERED, this 29th day of October, 2007.

s/ Hugh Lawson

Honorable Hugh Lawson
United States District Court
Middle District of Georgia

We consent to the within and foregoing order:

/s/ Simone Siex

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(signed with express permission by Matthew S. Knoop)

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